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14 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

16 UNITED STATES DISTRICT COURT  
17 CENTRAL DISTRICT OF CALIFORNIA  
18 WESTERN DIVISION

19 UNITED STATES OF AMERICA,  
20 Plaintiff,  
21  
22 v.  
23 CALIFORNIA INTERSCHOLASTIC  
FEDERATION and CALIFORNIA  
24 DEPARTMENT OF EDUCATION,  
25 Defendants.

Case No. 8:25-cv-01485-CV-JDE

STIPULATION TO STAY CASE DUE  
TO LACK OF APPROPRIATIONS  
FOR PLAINTIFF

DATE: No Hearing  
TIME: No Hearing

1 Plaintiff United States of America (“Plaintiff”) and defendants California  
2 Interscholastic Federation and California Department of Education (collectively,  
3 “Defendants”), by and through their respective counsel of record, hereby stipulate  
4 and agree that this case, including all hearing dates and deadlines set by rule or prior  
5 court orders, should be STAYED until Congress has enacted legislation to restore  
6 funding for the U.S. Department of Justice and the shutdown of the Federal  
7 Government has come to an end.

8 **BASIS FOR REQUESTED STAY**

9 1. At midnight on September 30, 2025, the appropriations act that had been  
10 funding the U.S. Department of Justice expired and appropriations to the  
11 Department lapsed. The Department does not know when funding will be restored  
12 by Congress.

13 2. Absent an appropriation, attorneys of the U.S. Department of Justice are  
14 prohibited from performing work on behalf of the Federal Government, even on a  
15 voluntary basis, except in very limited circumstances that are set forth in the  
16 applicable statute, including, for example, “emergencies involving the safety of  
17 human life or the protection of property.” 31 U.S.C. § 1342. Under that exception,  
18 the Plaintiff’s counsel are only permitted to work on certain matters authorized  
19 under the statutory framework (*e.g.*, criminal cases) and limited projects such as this  
20 motion to ensure Department functions are suspended in a responsible manner.

21 3. Counsel for Plaintiff have hoped that the government shutdown would  
22 have been lifted by this date, but Congress still has not restored appropriations for  
23 the Department of Justice and other components of the Federal Government. As  
24 noted above, Plaintiff’s counsel also do not know when appropriations will be  
25 restored.

26 4. Due to the continuing shutdown, Plaintiff’s counsel have determined that  
27 a stay is necessary because the continued shutdown is now interfering with their  
28 ability to represent the Plaintiff in this case. In particular, a hearing on Defendants’

1 motion to dismiss is currently scheduled for Friday of next week, October 24, 2025,  
2 and the work to be done in preparation for the December 12, 2025 Scheduling  
3 Conference (*e.g.*, preparing the Joint Rule 26(f) Report) needs to be commenced.

4 5. In light of the foregoing, counsel for Plaintiff have conferred with  
5 Defendants' Counsel about the need for the requested stay. As indicated by their  
6 signatures below, counsel for both Defendants do not oppose the stay.

7 WHEREFORE, the parties respectfully request that the Court grant the stay  
8 requested in this Stipulation and enter the proposed order that is lodged together  
9 with this Stipulation.

10 DATED: October 17, 2025.

HARMEET K. DHILLON  
Assistant Attorney General  
Civil Rights Division

*/s/ Robert J. Keenan*

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ROBERT J. KEENAN  
Senior Counsel  
Attorneys for Plaintiff  
United States of America

16 DATED: October 17, 2025.

ROB BONTA  
California Attorney General

*/s/ Edward W. Nugent*

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EDWARD W. NUGENT  
Attorneys for Defendant  
California Department of Education

21 DATED: October 17, 2025.

SPINELLI, DONALD & NOTT

*/s/ J. Scott Donald*

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J. SCOTT DONALD  
Attorneys for Defendant  
California Interscholastic Federation

**FILER'S ATTESTATION**

The filer attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized this filing.

DATED: October 17, 2025.

/s/ Robert J. Keenan  
ROBERT J. KEENAN